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18 *Attorneys for Defendants*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 SARA KIM NGUYEN, individually,

22 Case No.: 2:21-cv-00213-KJD-BNW

23 Plaintiff,

24 vs.

25 LANE F. SMITH, M.D., individually; SMITH
26 SALON, LLC dba Chic La Vie, a Limited-
27 Liability Company; SMITH PLASTIC
28 SURGERY INSTITUTE, PC, a Professional
29 Corporation; SMITH PLASTIC SURGERY
30 BUILDING LLC, a Limited-Liability Company;
31 ROE ENTITIES I – V, inclusive,

32 **STIPULATION AND PROPOSED
33 ORDER TO EXTEND TIME FOR
34 PLAINTIFF TO RESPOND TO
35 DEFENDANT'S PENDING MOTIONS
36 TO SEAL OR STRIKE
37 AND
38 TO EXTEND TIME FOR
39 CORPORATE DEFENDANTS TO
40 RESPOND TO THE COMPLAINT
(First Request)**

41 Defendants.

42 Defendant Lane F. Smith, M.D. (hereinafter "Dr. Smith") by and through his counsel,
43 Amanda L. Ireland, Esq. and Gabriel L. Grasso, Esq., and Plaintiff, Sarah Kim Nguyen,
44 (hereinafter "Plaintiff") by and through her counsel of record Andre M. Lagomarsino, Esq. and
45 Cory M. Ford, Esq., do hereby stipulate and agree to an 11-day extension of time for Plaintiff to

1 respond to Defendant's Motion to Seal Complaint, or, in the Alternative, Motion to Strike
2 Scandalous Immaterial Matter (Doc. #9) ("Motion to Seal or Strike") from March 12, 2021 until
3 March 22, 2021. The Complaint was filed on February 9, 2021, and the Motion to Seal or Strike
4 was filed on February 26, 2021.

5 The parties further stipulate and agree to extend the time for the corporate defendants
6 (Smith Salon, LLC, Smith Plastic Surgery Institute, PC, and Smith Plastic Surgery Building,
7 LLC) to appear and respond to the Plaintiff's Complaint (Doc. #1) from March 15, 2021 until 14
days after notice of the Court's action on the Motion to Seal or Strike.

8 These requests are submitted pursuant to Local Rules IA 6-1, 6-2 and II 7-1 and the
9 Federal Rules of Civil Procedure 12(a)(4), and 12(f), and are the parties' first requests for an
10 extension of pending deadlines.

11 These extensions are requested due to agreements between counsel for the parties, and for
good cause. Counsel for Dr. Smith sought an extension for the corporate defendants to respond
12 to the Complaint in the interests of litigation efficiency and avoiding needless duplication of
13 responsive pleadings in light of Dr. Smith's FRCP 12(b) Motion to Seal or Strike.

14 Meanwhile, counsel for the Plaintiff requested an extension to respond to the Motion to
15 Seal or Strike due to an attorney leaving his law office to start his own practice.

16 Accordingly, Plaintiff shall have up to and including March 22, 2021 to respond to
17 Defendant's Motion to Seal or Strike, and the corporate defendants (Smith Salon, LLC, Smith
18 Plastic Surgery Institute, PC, and Smith Plastic Surgery Building, LLC) shall have until 14 days
19 after notice of the Court's action on the Motion to Seal or Strike.

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Dated this 11th day of March 2021.

IRELAND LAW GROUP, LLC

/s/ Amanda L. Ireland

By: _____
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Attorneys for Defendants

Dated this 11th day of March 2021.

LAGOMARSINO LAW

/s/ Andre M. Lagomarsino

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Attorneys for Plaintiff

IT IS SO ORDERED:

Gernot Weiske

UNITED STATES DISTRICT JUDGE

Dated: March 15, 2021